



GRANTED

EFiled: Aug 09 2022 01:29PM EDT
Transaction ID 67914383
Case No. 2020-0766-JTL



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

STREAM TV NETWORKS, INC.,)

Plaintiff,)

v.)

C.A. No. 2020-0766 JTL

SEECUBIC, INC.,)

Defendant.)

SEECUBIC, INC.,)

Counterclaim and
Third-Party Plaintiff,)

v.)

STREAM TV NETWORKS, INC.,)

Counterclaim Defendant,)

and)

MATHU RAJAN and RAJA RAJAN,)

Third-Party Defendants.)

**[PROPOSED] ORDER GRANTING STREAM TV NETWORKS, INC.'S
MOTION FOR A TEMPORARY RESTRAINING ORDER**

WHEREAS, on August 1, 2022 Plaintiff/Counterclaim Defendant Stream TV Networks, Inc. (“Stream”) filed a Motion for a Temporary Restraining Order (the “TRO Motion”); and

WHEREAS, the Court, having considered the TRO Motion, all responses thereto, and all further related arguments and submissions;

IT IS HEREBY ORDERED this ____ day of _____, 2022 that:

1. The TRO Motion is GRANTED.
2. Effective immediately and until further Order from this Court, SeeCubic, Inc. (“SeeCubic”), including all those acting in concert with SeeCubic, is hereby ENJOINED from taking any action to sell Stream’s Assets (as defined in the TRO Motion) pending the Court’s decision on Stream’s Renewed Entry of Partial Final Judgment under Rule 54(b) (Dkt. 252).

The Honorable J. Travis Laster

This document constitutes a ruling of the court and should be treated as such.

Court: DE Court of Chancery Civil Action

Judge: J Travis Laster

File & Serve

Transaction ID: 67888677

Current Date: Aug 09, 2022

Case Number: 2020-0766-JTL

Case Name: CONF ORD ON DISC - STREAM TV NETWORKS, INC. v. SEECUBIC, INC.

Court Authorizer: J Travis Laster

Court Authorizer

Comments:

Stream has a colorable claim to its assets and faces a threat of irreparable harm if it must address creditors' claims without the benefit of its assets. Accordingly, absent any further rulings by the court, the order of events will be as follows:

1. The court will review the parties' submissions and enter a Rule 54(b) order that provides for SeeCubic to restore Stream's assets to Stream.
2. SeeCubic will restore Stream's assets to Stream in accordance with the Rule 54(b) order.
3. Once this has occurred, SeeCubic may seek to exercise any creditor's rights it possesses against Stream. SeeCubic must do so based on a status quo where Stream has title to and possession of its assets, not a status quo in which SeeCubic acquired possession based on a decision that the Delaware Supreme Court has held is erroneous.
4. Any party may seek to modify this order for good cause shown. If SeeCubic wishes to exercise creditors' rights, it must file an affirmative application spelling out how it acquired those rights, explaining the applicable law governing those rights, and seeking leave to exercise those rights.

/s/ Judge J Travis Laster